

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ROADGET BUSINESS PTE. LTD., a private  
limited company organized in the country of  
Singapore,

*Plaintiff,*

v.

PDD HOLDINGS INC., a Cayman Islands  
corporation, and WHALECO, INC., a  
Delaware corporation, and DOES 1-60,

*Defendants.*

Civil Action No. 1:22-cv-07119

Judge: Hon. Franklin U. Valderrama

Magistrate Judge: Hon. Jeffrey Cummings

**JURY TRIAL DEMANDED**

**DECLARATION OF ANDREW SCHAPIRO**

I, Andrew Schapiro, hereby declare as follows:

1. I am one of the attorneys for Plaintiff Roadget Business Pte. Ltd. (“Roadget”) in the above-captioned action.
2. I have knowledge of the facts set forth herein, and if called to testify as a witness thereto, I could and would do so competently under oath.
3. I submit this Declaration in conjunction with Roadget’s Motion to Compel Defendant PDD Holdings Inc. (“PDD Holdings”) to Produce Discovery.
4. Attached hereto as Exhibit 1 is a true and correct copy of email correspondence between counsel dated August 29, 2023 to September 6, 2023.
5. Attached hereto as Exhibit 2 is a true and correct copy of Defendants’ Second Set of Requests for Production to Roadget, dated August 25, 2023.
6. Attached hereto as Exhibit 3 is a true and correct copy of PDD Holdings’ Responses and Objections to Roadget’s Requests for Admission, dated July 24, 2023.

7. Attached hereto as Exhibit 4 is a true and correct copy of PDD Holdings' Responses and Objections to Roadget's First Set of Requests for Production, dated June 1, 2023.

8. Attached hereto as Exhibit 5 is a true and correct copy of PDD Holdings' Responses and Objections to Roadget's First Set of Interrogatories, dated June 1, 2023.

9. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the transcript of the deposition of Tim Wei, dated July 20, 2023.

10. Attached hereto as Exhibit 7 is a true and correct copy of PDD Holdings' Responses and Objections to Roadget's Notice of Rule 30(b)(6) Deposition, dated July 26, 2023.

11. Attached hereto as Exhibit 8 is a true and correct copy of email correspondence between Kelly Yin and Barry Horwitz, dated June 29, 2023 to July 28, 2023.

12. Attached hereto as Exhibit 9 is a true and correct copy of Roadget's Notice of Deposition of Yao Wu, dated July 28, 2023.

13. Attached hereto as Exhibit 10 is a true and correct copy of Roadget's Notice of Deposition of Zoe Ji, dated July 28, 2023.

14. Attached hereto as Exhibit 11 is a true and correct copy of email correspondence between Ryan Benyamin and Barry Horwitz, dated July 28, 2023 to August 16, 2023.

15. Attached hereto as Exhibit 12 is a true and correct copy of PDD Holdings' Rule 26 Initial Disclosures, dated April 19, 2023.

16. Attached hereto as Exhibit 13 is a true and correct copy of letter correspondence from Lori Chang, dated August 29, 2023.

17. Attached hereto as Exhibit 14 is a true and correct copy of email correspondence between Anna Naydonov and Lori Chang, dated September 8, 2023 to September 9, 2023.

18. Attached hereto as Exhibit 15 is a true and correct copy of PDD Holdings' Amended Responses and Objections to Roadget's First Set of Requests for Production, dated September 9, 2023.

19. Attached hereto as Exhibit 16 is a true and correct copy of PDD Holdings' Amended Responses and Objections to Roadget's First Set of Interrogatories, dated September 9, 2023.

20. Attached hereto as Exhibit 17 is a true and correct copy of a redline comparison between PDD Holdings' Initial and Amended Responses and Objections to Roadget's First Set of Requests for Production.

21. Attached hereto as Exhibit 18 is a true and correct copy of a redline comparison between PDD Holdings' Initial and Amended Responses and Objections to Roadget's First Set of Interrogatories.

22. Attached hereto as Exhibit 19 is a true and correct copy of Roadget's Rule 30(b)(6) notice to PDD Holdings, dated August 31, 2023.

23. Attached hereto as Exhibit 20 is a true and correct copy of email correspondence between Matthew Devine and Maja Sherman, dated August 31, 2023 to September 7, 2023

24. Attached hereto as Exhibit 21 is a true and correct copy of PDD Holdings' Responses and Objections to Roadget's Second Set of Requests for Production, dated October 2, 2023.

I submit this Declaration pursuant to 28 U.S.C. § 1746(2). I declare under penalty of perjury that the foregoing is true and correct and that this Declaration was executed on the date shown below, at Chicago, Illinois.

Dated: October 16, 2023

/s/ Andrew Schapiro  
Andrew Schapiro